

**UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF LOUISIANA**

**UNITED STATES OF AMERICA**

\*

v.

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**CRIMINAL NO.: 11-121**

**TAMIKA WILSON**

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**SECTION: "J"**

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**F A C T U A L   B A S I S**

Should this matter proceed to trial, both the Government and the defendant, **TAMIKA WILSON** (hereinafter "Defendant" or "Wilson") do hereby stipulate and agree that the following facts set forth a sufficient factual basis for the crimes to which the defendant is pleading guilty. The Government and the defendant further stipulate that the Government would have proven, through the introduction of competent testimony and admissible, tangible exhibits, the following facts, beyond a reasonable doubt, to support the allegations in the Bill of Information now pending against the defendant, to which Defendant has agreed to plead guilty as charged:

A Special Agent with Immigration and Customs Enforcement ("ICE") would testify that on or about December 11, 2010, ICE agents observed Defendant selling and attempting to sell numerous counterfeit items at the Algiers Flea Market, in New Orleans, Louisiana, within the

Eastern District of Louisiana. **Wilson** was present at the Algiers Flea Market and was actively attempting to sell and traffic in the counterfeit items.

ICE agents would testify that, after identifying themselves and confirming that the items were counterfeit, they spoke personally with **WILSON** on or about December 11, 2010, while at the Algiers Flea Market. **WILSON** admitted that she knew the items she was selling were counterfeit and described how, and from where, she purchased them. **WILSON** further assisted ICE agents in identifying the counterfeit items in her possession in which she knowingly sold and attempted to sell.

ICE agents would further testify that on or about December 11, 2010, ICE agents determined that **WILSON** was attempting to traffic in the following items, which ICE agents verified as counterfeit: 28 pairs of “Timberland” shoes; 227 pairs of “Nike” shoes; 14 pairs of “Gucci” shoes; 28 sets of “Polo” sweatsuits; 43 pairs of “True Religion” blue jeans; and 58 pairs of “MEK” blue jeans.

Additionally, on or about December 10, 2010, ICE agents executed a search warrant upon a storage unit located at A-AAA Key Mini Storage, 525 Jefferson Highway, Jefferson, Louisiana, that was rented by **WILSON**, during which they located, identified, and confiscated 16 pairs of counterfeit “Timberland” shoes and 85 pairs of counterfeit “Nike” shoes.

ICE agents seized the all of the above-described items and determined their collective fair market value to be approximately \$57,730.00. The aforementioned items were seized because they bear counterfeits of trademarks that are registered with the United States Patent and Trademark Office and are recorded with Customs and Border Protection.

ICE agents would further testify that **WILSON** admitted that she intentionally trafficked in these counterfeit goods in that she purchased the above-listed items for the purpose of selling to the public with full knowledge that they were counterfeit. Defendant further admits that she knowingly used and caused to be used counterfeit marks on and in connection with such goods and services, including marks which were in use and registered on the principal register of the United States Patent and Trademark Office on the “Timberland” shoes, “Nike” shoes, “Gucci” shoes, “Polo” sweatsuits, “True Religion” blue jeans, and “MEK” blue jeans found at the stand at the Algiers Flea Market operated by **WILSON**.

Defendant further admits that the use of the counterfeit marks on the seized items was likely to cause confusion, to cause mistake, and to deceive the public into believing that the items were genuine Timberland, Nike, Gucci, Polo, True Religion, and MEK merchandise.

Experts in trademarks and counterfeit goods would testify that the items seized from **WILSON** are indeed counterfeit and produced without authorization from the trademark holders and in violation of Federal criminal law.

The above facts come from an investigation conducted by agents from ICE, documents from the United States Patent and Trade Office, evidence and testimony obtained in the course of the investigation by ICE, and voluntary statements made by the defendant, **TAMIKA WILSON**, to agents from ICE.

**APPROVED AND ACCEPTED:**

TAMIKA WILSON  
Defendant

HILLIARD FAZANDE, III                      Date \_\_\_\_\_  
(Louisiana Bar No. \_\_\_\_\_)  
Attorney for Defendant Wilson

JORDAN GINSBERG  
(Illinois Bar No. 6282956)  
Assistant United States Attorney